

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC,)	CASE NO. 1:19-cv-145
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	MAGISTRATE JUDGE
)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO,)	
LLC, <i>et. al.</i> ,)	
)	
Defendants.)	

RECEIVER'S MOTION FOR EXTENSION OF TIME TO FILE
HIS RESPONSE TO THE FILING BY THE ADMINISTRATION
AND STAFF OF THE ART INSTITUTE OF LAS VEGAS

Mark E. Dottore, the duly appointed and acting receiver herein (the “**Receiver**”), by and through his undersigned counsel, respectfully moves this Court for a seven (7) day extension of the deadline—*i.e.*, through and including March 13, 2020—for the filing of his response to the filing by the Administration and Staff of the Art Institute of Las Vegas [Dkt. No. 536] (the “**Filing**”). If the Filing is taken to be a non-dispositive motion, then Rule 7.1(d) of the Local Rules for the United States District Court for the Northern District of Ohio requires that any memorandum in opposition to the Filing be filed and served within fourteen (14) days after service (February 21, 2020); *i.e.*, on or before March 6, 2020.

The Receiver has worked diligently over the past two weeks to assemble his response so that it will consist of detailed financial data and an accurate timeline of events. However, the Receiver and his counsel have found that the two-week

timeframe has proved insufficient to respond to the Filing's nine single-spaced pages. This request for extension is not made for the purpose of delay, but rather to avoid filing a response that would otherwise require the filing of a supplementary response.

WHEREFORE, the Receiver requests that this Court to enter an order (i) extending the deadline for the filing of his response to the Filing to an including March 13, 2020; and (ii) for such other and further relief as is just.

Dated: March 6, 2020

Respectfully submitted,

/s/ Mary K. Whitmer

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